

Federal Communications Commission  
Laboratory Division  
7435 Oakland Mills Road  
Columbia MD 21046

Date: January 14, 2013  
Subject: Request for Confidentiality  
FCC ID: A4R-X1

To Whom It May Concern:

Pursuant to the provisions of Sections 0.457 and 0.459 of the Commission's rules (47 CFR §§ 0.457, 0.459), Google Inc. requests that the Commission withhold the following attachments associated with the certification application for the above-referenced FCC ID from public disclosure indefinitely.

Block Diagram  
Operational and Technical Description (Theory of Operation)  
Schematic Diagrams  
WiFi and Bluetooth Antenna Specification (WiFi and Bluetooth Antenna Specification)

In support of this request, Google provides the following information:

1. **Identification of the specific information for which confidential treatment is sought (§ 0.459(b)(1)):** Google requests that all of the information contained in above-referenced exhibits to the certification application be withheld from routine public disclosure.
2. **Identification of the Commission proceeding in which the information was submitted or a description of the circumstances giving rise to the submission. (§ 0.459(b)(2)):** The material is being submitted in connection with Google's certification application for FCC ID A4R-X1.
3. **Explanation of the degree to which the information is commercial, or financial or contains a trade secret or is privileged (§ 0.459(b)(3)):** The market for the technology that is the subject of the certification application is a highly competitive one, with numerous high tech companies competing for the business of potential customers. Were Google's competitors to become aware of the facts set forth in the above-referenced exhibits to the application at this time, it could have an adverse impact on Google's competitive standing and deprive Google of the marketplace benefit it otherwise might achieve by virtue of having product available before other competitors. If any of the information for which confidential treatment is sought were to be made publicly available, Google's competitors could reasonably determine the scope and status of our activities.

4. **Explanation of the degree to which the information concerns a service that is competitive (§ 0.459(b)(4)):** The technology that is the subject of the certification application is subject to intense competition from other manufacturers and service providers who are developing competing services and technology.
5. **Explanation of how disclosure of the information could result in substantial competitive harm (§ 0.459(b)(5)):** As noted above, were Google's competitors to become aware of the facts set forth in the above-referenced exhibits to the application at this time, it could have an adverse impact on Google's competitive standing and deprive Google of the marketplace benefit it otherwise will achieve by virtue of having product available before other providers.
6. **Identification of any measures taken by the requesting party to prevent unauthorized disclosure (§ 0.459(b)(6)):** This information contained in the above-referenced exhibits to the certification application has been strictly controlled by Google, with distribution limited to internal use only and for the specific purpose of conducting research, development, and testing of the technology.
7. **Identification of whether the information is available to the public and the extent of any previous disclosures of the information to any third parties (§ 0.459(b)(7)):** The information that Google requests be maintained as confidential is not available publicly. The information in the above-referenced exhibits to the certification application has been carefully protected and kept confidential by limiting external contacts to privileged and confidential communications.
8. **Justification of the period during which the submitting party asserts that material should not be available for public disclosure (§ 0.459(b)(8)):** Given the competitive nature of the marketplace, any disclosure that Google has developed the technology discussed in the above-reference exhibits to the certification application would harm Google's competitive position. The information subject to this request for confidentiality should not be made available for public disclosure at any time.

In additional to above-referenced documents, pursuant to Public Notice DA 04-1705 of the Commission's policy, in order to comply with the marketing regulations in 47 CFR §2.803 and the importation rules in 47 CFR §2.1204, while ensuring that business sensitive information remains confidential until the actual marketing of newly authorized devices, Google also requests that the Commission grant short-term confidential treatment and not release the following attachments for routine public disclosure until 180 days following the grant of this certification application.

External Photos

Internal Photos

User Manual (Installation and Operating Instructions)

Test Setup Photos (15B)

Test Setup Photos (BT)  
Test Setup Photos (WiFi)  
Test Setup Photos (SAR)

It is our understanding that test measurement reports and correspondence during the certification review process cannot be granted confidential treatment, and such information will be available for public review once the grant of equipment authorization is issued.

Sincerely yours,



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